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25 *Dexter E. Dale*

16 IN THE UNITED STATES DISTRICT COURT
17 FOR THE NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19
20 **DEXTER E. DALE,**

21 Plaintiff,

22 v.

23 C 05-1842 JSW (PR)

24 **STIPULATION AND ORDER TO**
25 **EXTEND DISCLOSURE OF EXPERT**
WITNESSES

26
27 **L. FERNANDEZ, L. LOUGH,**

28 Defendants.

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30 The parties to this action, plaintiff Dexter Dale (“plaintiff”) and Louella Fernandez and
31 Lillian Lough (“defendants”), hereby stipulate as follows:

1 WHEREAS, this Court set the close of non-expert discovery as March 1, 2012, and the
2 last day for expert discovery as April 1, 2012 (D.I. 50). On March 1, 2012 the Court ordered that
3 Plaintiff may hold the depositions of Defendant Lough and CTF's Rule 30(b)(6) witness after the
4 discovery cutoff date of March 1, 2012 (D.I. 68).

5 WHEREAS, due to Defendant Lough's health and travel conflicts, the parties have not yet
6 been able to hold the deposition of Defendant Lough, and the parties' experts will not be able to
7 review Defendant Lough's testimony until after the last day for expert discovery.

8 WHEREAS, certain discovery disputes regarding document productions have not yet been
9 resolved (D.I. 72). If produced, these documents will be relevant to any expert analysis.

10 WHEREAS, the proposed extension of expert discovery will not affect the current trial
11 schedule.

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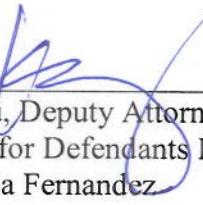
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1 IT IS HEREBY STIPULATED AND AGREED SUBJECT TO APPROVAL OF THE
2 COURT THAT:

3 1. The disclosure of expert witnesses is to be extended to May 4, 2012.
4 2. The depositions of expert witnesses must be completed by June 1, 2012.

5 Dated: March 20, 2012

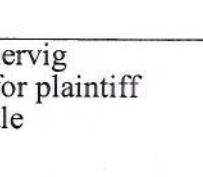
6 KAMALA HARRIS, Attorney General
7 of the State of California

8 By: 

9 Kay K. Yu, Deputy Attorney General
10 Attorneys for Defendants Lillian Lough
11 and Louella Fernandez

12 Dated: March 20, 2012

13 DECHERT LLP
14 H. JOSEPH ESCHER III
15 AMY THAYER
16 CARL GISMERIG

17 By: 

18 Carl Gismervig
19 Attorney for plaintiff
20 Dexter Dale

21 IT IS SO ORDERED.

22 THE HONORABLE JEFFREY S WHITE
23 United States District Judge

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2 COURT THAT:

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and Louella Fernandez

11 Dated: March 20, 2012

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13 By:

14 15 Carl Gismervig
16 Attorney for plaintiff
17 Dexter Dale

18 IT IS SO ORDERED.

19 March 21, 2012

20 THE HONORABLE JEFFREY S. WHITE
21 United States District Judge

22 23 24 25 26 27 28



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